

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**[PROPOSED] ORDER GRANTING BRET
STANLEY'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL [ECF
4780]**

This Document Relates to:

Judge: Hon. Lisa J. Cisneros
Courtroom: G-15th Floor

ALL ACTIONS

Having considered “Bret Stanley’s Administrative Motion to File Under Seal Portions of Supporting Materials in Response to Motion for Sanctions” (ECF 4780), dated December 22, 2025, and having further considered Defendants’ Statement In Support of Bret Stanley’s Administrative Motion to File Under Seal [ECF 4780], dated December 29, 2025, ECF _____ (“Defendants’ Statement”), the Court hereby ORDERS that the following material remain under seal, as stated in Defendants’ Statement:

Document	Description	Defendants’ Request
The Sanctions Response (ECF 4780-3; redacted version filed at ECF 4783)	Confidential, non-public information regarding safety and compliance audit procedures developed and utilized by Uber in its Uber Eats (non-Rides) business as well as personally identifiable information (“PII”).	Seal in part (portions of pages 1, 4-7, 9-11, and 14)
The Stanley Declaration (ECF 4780-4; redacted version filed at ECF 4783-1)	Confidential, non-public information regarding safety and compliance audit procedures developed and utilized by Uber in its Uber Eats (non-Rides) business as well as PII.	Seal in part (portions of ¶¶1, 5-10, 14-17, 19-20, 23, 26, 28, 31, 37-39, 41-42, 44-45, and FN 1)
Exhibit 1 to the Stanley Declaration (ECF 4780-5; redacted version filed at ECF 4783-2)	The <i>Smith</i> plaintiff’s requests for production (“RFP”) referencing confidential, non-public information regarding safety and compliance audit procedures developed and utilized by Uber in its Uber Eats (non-Rides) business as well as PII.	Seal in part (portions of RFPs 65 and 70, as well as the bolded title above RFP 70)
Exhibit 2 to the Stanley Declaration (ECF 4780-6; redacted version filed at ECF 4783-3)	Uber’s objections to RFPs in the <i>Smith</i> case that reference confidential, non-public information regarding safety and compliance audit procedures developed and utilized by Uber in its Uber Eats (non-Rides) business as well as PII.	Seal in part (portions of objections to RFPs 70 and 72)

Document	Description	Defendants' Request
Exhibit 3 to the Stanley Declaration (ECF 4780-7; redacted version filed at ECF 4783-4)	11/5/25 hearing transcript from the <i>Smith</i> case referencing confidential, non-public information regarding safety and compliance audit procedures developed and utilized by Uber in its Uber Eats (non-Rides) business.	Seal in part (portions of transcript at 70:15-20; portions of transcript at 70:24; transcript at 71:5-9; and portions of transcript at 71:11)
Exhibit 4 to the Stanley Declaration (ECF 4780-8; redacted version filed at ECF 4783-5)	Judge's notes from the <i>Smith</i> case referencing confidential, non-public information regarding safety and compliance audit procedures developed and utilized by Uber in its Uber Eats (non-Rides) business.	Seal in part (portion of page 3 of Judge's notes referencing RFP 70)
Exhibit 5 to the Stanley Declaration (ECF 4780-9; redacted version filed at ECF 4783-6)	Email correspondence referencing confidential, non-public information regarding safety and compliance audit procedures developed and utilized by Uber in its Uber Eats (non-Rides) business.	Seal in part (portions of: (1) Stanley 11/24 email; (2) Stanley 11/18 email; (3) Angotti 11/18 email; and (4) Stanley 11/13 email)
Exhibit 6 to the Stanley Declaration (ECF 4780-10; redacted version filed at ECF 4780-7)	Email correspondence referencing confidential, non-public information regarding safety and compliance audit procedures developed and utilized by Uber in its Uber Eats (non-Rides) business.	Seal in part (portions of: (1) Gromada 10/28 email (10:39 pm); (2) Stanley 10/28 email; (3) Gromada 10/28 email (7:08 pm); and (4) Gromada 10/21 email)

The Court also ORDERS Bret Stanley to refile his Sanctions Response (ECF 4783), Declaration (ECF 4783-1), and Exhibits 1-6 to his Declaration (ECF 4783-2 through ECF 4783-7) with redactions consistent with the revised redactions set forth in Defendants' Statement (ECF _____) and Exhibits A through H to the Declaration of Daniel Cummings In Support of Defendants' Statement (ECF _____), within 7 days of the date of this Order.

IT IS SO ORDERED:

1 Dated: _____

2 HON. LISA J. CISNEROS
3 United States Magistrate Judge
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